



August 18, 2021

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
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New York, New York 10007

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Re: *State of Texas, et al., v. Google LLC*, No. 4:20-cv-00957-SDJ (E.D. Tex.); Plaintiff States' Submission of Motion for Leave to File Second Amended Complaint and Submission of Unredacted Complaints Pursuant to Pre-Trial Order No. 1, *In re Google Digital Advertising*, 1:21-md-03010-PKC

Dear Judge Castel:

As lead counsel in the States' case *State of Texas, et al., v. Google LLC*, No. 4:20-cv-00957-SDJ (E.D. Tex.), we submit this letter and Exhibit A pursuant to paragraph five of the Court's Pre-Trial Order No. 1 (Dkt. No. 4), which relates to submission of Plaintiff States' Motion for Leave to File Second Amended Complaint and unredacted versions of the proposed Second Amended Complaint, the Original Complaint, and the First Amended Complaint. Exhibit A contains the Motion for Leave along with a proposed Order Granting Motion for Leave, as these documents were filed on August 4, 2021, in the U.S. District Court – Eastern District of Texas. Per the Court's clerk, we are also submitting to the Court paper copies of this letter and Exhibit A, and electronic and paper copies of the requested unredacted complaints, which were filed under seal. Pursuant to your Individual Practices, we note that no conferences before the Court have been scheduled. The Court did, however—in its Pre-Trial Order No. 1—invite the parties to comment on that Order in the next twenty-one days.

The Court's Pre-Trial Order No. 1 instructs the Plaintiff States to “submit their proposed motion for leave to file a second amended complaint, together with unredacted copies of their proposed second amended complaint and the original and first amended complaint.” We understand this directive to require the submission of our previously filed documents, but Plaintiff States will, in short order, file new versions of the Motion for Leave and proposed Order Granting Motion

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for Leave under this Court's style and case heading should the Court so instruct.

Please note that the unredacted versions of the Plaintiff States' proposed and past complaints are to be sealed and relate only to the *State of Texas, et al., v. Google LLC*, No. 4:20-cv-00957-SDJ (E.D. Tex.). These unredacted complaints are subject to a protective order in the Eastern District of Texas; the other plaintiffs in the MDL are neither subject to that protective order nor privy to the unredacted complaints.

In short, as described above, we are submitting electronic and paper copies of the Motion for Leave to File Second Amended Complaint, the proposed Order Granting Motion for Leave, and the unredacted versions of the proposed Second Amended Complaint, the Original Complaint, and the First Amended Complaint.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ W. Mark Lanier

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